

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS  
BOSTON, MASSACHUSETTS**

<u>UNITED STATES OF AMERICA</u>	)	
	)	Criminal No. 24 CR 10173-DJC
v.	)	
	)	
<u>LUIS FELIZ SANTANA</u>	)	
	)	

**ASSENTED TO MOTION FOR RELEASE ON CONDITIONS OF BAIL**

Now comes the Defendant in the above-entitled matter and requests that this Honorable Court release him on conditions of bail pursuant to 18 U.S.C. §3142(a)(1).

The Defendant would propose that he be released on the following conditions:

1. Reside at 82 Pleasant Valley Street, Methuen, MA 01844.
2. Have Alexis Suero Aponte act as a third-party custodian for the Defendant.
3. Have Ms. Alexis Suero sign a \$25,000.00 unsecured bond.
4. Not use any false identity, including "Miguel Neris"
5. Surrender any passport and not obtain new international travel document
6. Actively seek employment
7. Not travel outside MA, NH, CT, NJ or NY
8. Avoid all contact with witnesses, including co-defendants, except through counsel (list to be provided by govt.)

**PERSONAL HISTORY**

Luis Ramon Feliz Santana was born on October 10, 1983, in Venezuela and is a lawful permanent resident in the United States. When he was only (1) years old, his mother gave custody of Luis to his paternal grandparents, Petronila and Teodicio Felix, who brought him to the United States. Mr. Feliz is the only child to be born from both of his parents, but he does have three (3) other siblings (Astrid Felix, Roulois Felix, and

Shania Felix) from his father and stepmother's side and is the oldest among them. Mr. Feliz was raised by his grandparents who have cared and looked after him, always treating him as their own son. He was raised in Lawrence and Methuen area, graduating from Methuen High in 2001. To this day Mr. Feliz has no connection to anyone in Venezuela and has never returned to his home country.

Before his arrest, Mr. Feliz was the designated PCA to his grandparents. As such, he was responsible for the daily needs of both of his grandparents, Petronila (75 years of age) and his grandfather, Teodicio Felix (82 years of age). His responsibilities have included but are not limited to administering their many daily medications, transporting them to and from their appointments, and spending time with them to not neglect their emotional and mental well-being and as a result their physical health.

His is also a caretaker for his 36 year old brother, Rouluis Felix, who was diagnosed with bipolar and schizophrenia 15 years ago. He is currently living in a facility for mentally impaired adults in Amesbury, MA, he residing with Mr. Feliz for an estimated three (3) years before being institutionalized. Mr. Feliz is responsible for his brother's finances, legal decisions, social security, and health decisions. His brother, too, has depended on him on a daily basis.

Mr. Feliz and his partner, Alexis Suero, have been together for a little over twelve (12) years now, and loving and supportive relationship. Ms. Suero, 42, owns a spa in Andover, MA. working 35 hours a week and has enrolled in the nursing program at Northern Essex Community College. While they do not have any children together, they own a dog together and host his niece and nephew from the Dominican Republic every Summer and Christmas. also have a dog together with whom Luis was co-responsible for

walking, playing and feeding. Aside from all of these responsibilities with family, he is an independent contractor and self-employed demolition laborer. He has been working these jobs for about five (5) to six (6) years now from Monday to Friday from 7:00 AM to 4:00 PM and sometimes weekends if needed. On his rest days he enjoys spending time with his partner Alexis and his family whether it is a special family reunion or merely to be in each other's presence.

Mr. Feliz deeply cares for his family and his actions and day to day responsibilities are a clear demonstration. Since this incident Ms. Alexis has expressed that all of the responsibilities have fallen to her on top of her already demanding daily schedule. She has expressed that it has been very difficult to manage their home and family without him around. Ms. Alexis is not the only one who has expressed worry as a result of Mr. Feliz's absence. Because his grandparents cannot read or write, they demand daily attention in order to ensure that they are taking the proper medication, including the correct dose and at the time that they are directed to do so. Ms. Alexis has tried to keep up, but it is becoming increasingly difficult to do so as her schoolwork load, work load, and her personal responsibilities are piling up and closing in on her. She deeply cares for his family as if they were her own and does not want anything unfortunate to happen because she has so much on her plate. Alexis stresses that she and his grandparents and brother are really struggling without him and although the rest of the family tries to chip in, it is not enough. Mr. Feliz's absence is felt throughout his entire family.

Luis's relationship with his partner, grandmother, grandfather, and brother to name a few people is very tight knit so much so that he is needed on a daily basis whether it is for emotional, mental, financial, or physical support. With Luis's release, the daily

responsibilities of helping with his grandparents, financial support, and emotional well-being of his family would return to him and he would gladly accept them just as he has done the entirety of his life. Ms. Suero and his entire family miss him very much as well as he misses them. His absence has created a major change in the lives of his family members and they, as much as he, cannot wait for things to return to their normal state, where he is responsible for them, and they love each other in return. He has significant support from his family, and are ready to support him, however they can, to ensure his presence at future proceedings.

As such, he requests that the Court release him from detention and permit him to reside with his partner who has agreed to be a third-party custodian and provide him with a safe and supportive home environment. For the foregoing reasons, the Defendant respectfully requests that the Court release him from custody. The Defendant is willing to abide by any other conditions placed on him pending his matter in the Court.

Respectfully Submitted,  
LUIS FELIZ SANTANA  
By his attorney:

/s/ Eduardo Masferrer  
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